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October 17, 2003

Docket Management Facility for the  
National Highway Traffic Safety Administration  
Room PL-401  
400 Seventh Street, S.W.  
Washington, D.C. 20590

To Docket 03-14396:

WE ARE #1  
OCT 17 2003  
ALTA 03-14396-5

We are writing to support your proposal to change the rules that now require guards on the back ends of trailers. We have been told that you are proposing to exempt road construction controlled discharge trailers from this rule. We agree with this idea.

Las Vegas Paving is in the road building industry. We bid on contracts to build new roads and repair highways. We use horizontal controlled discharge trailers in our business, and we have found them to be versatile and safe alternatives to end dump trucks.

Controlled discharge trailers have several advantages. They help us manage the discharge of the asphalt into the paver without as much risk of spillage or overflow of the paver hoppers as we see with dump trucks. That keeps the maintenance costs at the worksite lower, and is also safer for the crew. Controlled discharge trailers also have made a significant contribution to road quality, because they can prevent asphalt segregation, which can be a problem with asphalt delivered by dump truck.

It would not be realistic to install rear guards on these trailers, because they have to be able to reach into the paver hoppers. A guard would prevent them from doing that. We do not like the idea of a movable guard, because it would increase our maintenance costs. It also would not be safe for our crews to try to handle the guard after it has had hot asphalt in it.

We have been told that your rules already exempt trailers that have their rear axles 12 inches or less from the back of the trailer. This will not work for asphalt discharge trailers because they have to be able to reach over and into the paver hoppers, and they need more than 12 inches to do that. We would not be interested in buying a controlled discharge trailer that could not reach into the paver hopper.

The 2003 road construction season is nearly over. We hope you will make a decision to allow this exemption quickly, before the late winter, when we make our final vehicle purchasing decisions for the beginning of the 2004 road construction season.

Sincerely,

LAS VEGAS PAVING CORP

  
Rick Ewing  
Coordinator